

## Exhibit D



Mike Cilento <michael@ilawco.com>

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## VPN v. Dikian - Meet and Confer Memorialization

1 message

Mike Cilento <michael@ilawco.com>

Mon, Jul 10, 2023 at 7:22 PM

To: Mike Rodenbaugh <mike@rodenbaugh.com>

Cc: Brett Lewis <brett@ilawco.com>

Bcc: Michael Druckman <mdruckman@ilawco.com>

Dear Mike R. - thanks for the meet and confer phone call. See below memorialization and let us know if anything is inaccurate.

We agreed to the following:

- 1) [REDACTED] will provide updated responses to ROGs and RFPs as well as a supplemental production of documents by the end of this week. Once VPN review, we will determine whether a second meet and confer is necessary.
- 2) VPN's deposition, of Michael Gargiulo, will take place in person on July 25th in Atlanta, with an early start time of 8:30am.
- 3) [REDACTED] deposition will take place on July 31 in LA, with an early start time of 8:30am. We understand [REDACTED] and we will try to book a location that is in between LAX airport and [REDACTED].

We discussed the following and need to confirm with our client

- 1) A stipulation to extend the following case deadlines:

Motion to Amend Pleading - August 28, 2023

Non-expert Discovery Cutoff -> September 4, 2023

First Round trial findings -> September 29, 2023 (moving up from the error on the scheduling order)

Second Round trial findings -> October 6, 2023 (moving up from the error on the scheduling order)

All other dates remain the same.

We said we would get back to each other in the next few days to confirm this is okay and then if so to draft a stip.

- 2) VPN will confirm availability for Sharjil for a remote deposition.

Thanks

Mike



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